

## IN THE UNITED STATES DISTRICT COURT

## FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 23-md-03084-CRB

This Document Relates to:

*Jaylynn Dean v. Uber Techs., Inc.*,  
N.D. Cal. No. 23-cv-06708  
D. Ariz. No. 25-cv-4276

**DECLARATION OF MAYA R. KALONIA  
IN SUPPORT OF ADMINISTRATIVE  
MOTION TO CONSIDER WHETHER  
ANOTHER PARTY'S MATERIAL  
SHOULD BE FILED UNDER SEAL**

I, Maya R. Kalonia, declare:

1. I am an attorney in the law firm of Girard Sharp LLP, and counsel for Plaintiffs in the above-captioned Multi-District Litigation. I am a member of the State Bar of California and am admitted to practice before this Court. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein.

2. Because the materials at issue were designated by Uber as "CONFIDENTIAL" and /or "HIGHLY CONFIDENTIAL", Plaintiff filed the following under seal:

Document	Description	Designating Party
[Unredacted] Plaintiff's Opposition to Defendants' Motion for Partial Summary Judgment	Portion of briefing referring to documents and testimony designated highly confidential and confidential	Uber Accurate Checkr
Exhibit 1	Elizabeth Ross 6/11/2025 and 6/12/2025 deposition transcript	Uber
Exhibit 2	Exhibit 3308-B to the 5/5/2025 deposition of Hannah Nilles	Uber
Exhibit 3	Exhibit 434 to the 3/27/2025 deposition of Gus Fuldner	Uber

Document	Description	Designating Party
Exhibit 4	Exhibit 2707 to the 4/10/2025 deposition of Andrew Hasbun	Uber
Exhibit 5	Exhibit 1110 to the 6/17/2025 deposition of Greg Brown	Uber
Exhibit 6	Exhibit 2005 to the 8/28/2025 deposition of Mariana Esteves	Uber
Exhibit 7	Mariana Esteves 8/28/2025 deposition transcript	Uber
Exhibit 9	Hannah Nilles 6/30/2025 deposition transcript	Uber
Exhibit 10	Exhibit 1052 to the 6/11/2025 deposition of Elizabeth Ross	Uber
Exhibit 11	Greg Brown 8/25/2025 and 8/26/2025 deposition transcript	Uber
Exhibit 12	Exhibit 1966B to the 8/26/2025 deposition of Greg Brown	Uber
Exhibit 13	Exhibit 1693 to the 7/15/2025 deposition of Greg Brown	Uber
Exhibit 14	Exhibit 1092 to the 6/17/2025 deposition of Greg Brown	Uber
Exhibit 15	Exhibit 2000 to the 8/25/2025 deposition of Mariana Esteves	Uber
Exhibit 16	Henry (Gus) Fuldner 3/26/2025 deposition transcript	Uber
Exhibit 17	Sunny Wong 6/25/2025 deposition transcript	Uber
Exhibit 18	Greg Brown 7/15/2025 deposition transcript	Uber
Exhibit 19	Greg Brown 7/16/2025 deposition transcript	Uber
Exhibit 20	Exhibit 2003 to the 8/25/2025 deposition of Mariana Esteves	Uber
Exhibit 22	UBER_MDL3084-BW-00027896	Uber
Exhibit 23	Exhibit 1884 to the 8/7/2025 deposition of Hannah Nilles	Uber
Exhibit 24	Exhibit 283 to the 3/13/2025 deposition of Tracey Breeden	Uber
Exhibit 25	Exhibit 613 to the 12/3/24 JCCP deposition of Kate Parker	Uber
Exhibit 28	Hannah Nilles 8/7/2025 deposition transcript	Uber
Exhibit 29	Exhibit 1239 to the 6/25/2025 deposition of Sunny Wong	Uber
Exhibit 30	Exhibit 2067A to the 10/14/2025 deposition of Sunny Wong	Uber
Exhibit 31	Sunny Wong 7/23/2025 deposition transcript	Uber
Exhibit 32	Exhibit 1240 to the 6/25/2025 deposition of Sunny Wong	Uber
Exhibit 33	Exhibit 1249 to the 6/25/2025 deposition of Sunny Wong	Uber
Exhibit 34	Exhibit 1248 to the 6/25/2025 deposition of Sunny Wong	Uber

Document	Description	Designating Party
Exhibit 35	Exhibit 3900 to the 5/20/2025 deposition of Michael Akamine	Uber
Exhibit 36	Hannah Nilles 7/23/2025 deposition transcript	Uber
Exhibit 37	Exhibit 636 to the 4/22/2025 deposition of Roger Kaiser	Uber
Exhibit 38	Exhibit 1062 to the 6/12/2025 deposition of Elizabeth Ross	Uber
Exhibit 39	Exhibit 1049 to the 6/11/2025 deposition of Elizabeth Ross al	Uber
Exhibit 40	Exhibit 1570 to the 7/11/2025 deposition of Todd Gaddis	Uber
Exhibit 41	Exhibit 1736 to the 3/14/2025 deposition of Greg Brown	Uber
Exhibit 42	Exhibit 1102 to the 6/17/2025 deposition of Greg Brown	Uber
Exhibit 43	Exhibit 1930 to the 8/25/2025 deposition of Greg Brown	Uber
Exhibit 44	UBER_JCCP_MDL_000108957	Uber
Exhibit 45	Exhibit 1104 to the 6/17/2025 deposition of Greg Brown	Uber
Exhibit 46	Exhibit 1101 to the 6/17/2025 deposition of Greg Brown	Uber
Exhibit 47	Exhibit 617 to the 12/3/2024 deposition of Kate Parker	Uber
Exhibit 48	Dara Khosrowshahi 7/1/2025 deposition transcript	Uber
Exhibit 49	Exhibit 1100 to the 6/17/2025 deposition of Greg Brown	Uber
Exhibit 50	Todd Gaddis 7/11/2025 deposition transcript	Uber
Exhibit 51	Greg Brown 6/17/2025 deposition transcript	Uber
Exhibit 52	Exhibit 1883 to the 8/7/2025 deposition of Hannah Nilles	Uber
Exhibit 53	Sunny Wong 10/14/2025 deposition transcript	Uber
Exhibit 54	Mariana Esteves 7/15/2025 deposition transcript	Uber
Exhibit 55	Exhibit 2071 to the 10/14/2025 deposition of Sunny Wong	Uber
Exhibit 56	Exhibit 2202 to the 3/26/2025 deposition of Gus Fuldner	Uber
Exhibit 57	Exhibit 1243 to the 6/25/25 deposition of Sunny Wong	Uber
Exhibit 58	Exhibit 645 to the 4/22/2025 deposition of Roger Kaiser	Uber
Exhibit 59	Rebecca Payne 5/13/2025 deposition transcript	Uber
Exhibit 60	Exhibit 2549 to the 4/3/2025 deposition of Rebecca Payne	Uber
Exhibit 61	Exhibit 1197 to the 6/17/2025 deposition of Jill Hazelbaker	Uber
Exhibit 63	ACCURATE001	Accurate

Document	Description	Designating Party
Exhibit 64	UBER-MDL3084-BW-00012056	Uber
Exhibit 65	CHECKR000891	Checkr
Exhibit 66	UBER_JCCP_MDL_005696277	Uber
Exhibit 67	CHECKR000894	Checkr
Exhibit 68	Hannah Nilles 8/7/2025 Wave I deposition transcript	Uber
Exhibit 69	UBER-MDL3084-BW-00027874	Uber
Exhibit 70	UBER-MDL3084-DFS00003621	Uber
Exhibit 72	Exhibit 1055 to the 6/11/2025 deposition of Elizabeth Ross	Uber
Exhibit 73	Expert report of Jason Morris	Uber

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 10, 2025 in San Francisco, California.

/s/ Maya R. Kalonia  
Maya R. Kalonia